P375 WORKGROUP MEETING SIX SUMMARY

Solution Overview

Registration and Agent appointment:

Data submission and aggregation:

We are concerned when future proofing this modification against other change that we do not just allow Virtual Lead Parties (VLPs) to register Asset Metering System Identifiers (AMSIDs). However, P375 will restrict the use of AMSIDs to Secondary BM Unit's (SBMU's), as the P375 defect is only concerned with VLPs and SBMU's. When drafting legal text we will try to accommodate future change, but changes needed to accommodate AMSID's into Primary BM Unit's will likely be picked up by P379 and other modifications. However, any Party (e.g. Suppliers) can register to be a VLP in addition to their existing Party role(s) and take advantage of Asset Metering.

Communications will be via the Data Transfer Network (DTN) or 'by other electronic means as agreed' (e.g. the two companies involved agree to use P-Flows).

Action: Identify D-flows that need amending and design P-flows. This will occur during implementation. Ideally existing D flows will be used where possible. i.e. HHDC's sending in demand data to SVAA.

Action: Confirm timelines for registration and submitting data etc. align with existing similar processes elsewhere in the BSC.

Impact Assessment

The Service Provider Impact Assessment (SPIA) is taking longer than originally intended. ELEXON is working internally on their own SPIA based on precedence and in-house knowledge. As soon as results are known, they will be shared.

Alternative Meter Operator Agents

The arguments for and against having a suitably qualified Meter Operator Agent (MOA) were:

- **For qualification** – Settlement integrity is paramount and while initial uptake may be relatively small and not have a huge impact on Settlement, the expectation is that within a few years this will not be the case
- **Against qualification** – P375 was raised to simplify market entry. Some companies installing Meters will not be traditional players in Settlement Metering so requiring them to qualify could be seen as onerous.

Asset Meter MOAs should be required to qualify but only to the extent required to be an AMSID MOA. They will only be qualified to provide MOA services for AMSIDs where they are not already a qualified MOA. There was a suggestion for VLPs to be responsible for their MOAs in the same way that Suppliers are for theirs (Supplier Hub principle).

Asset providers switching between VLPs

P375 should emulate the BSCP602 process for moving MSIDs between VLPs. We discussed if more time is needed for objections to be raised before the Effective from Settlement Date but this needs to be balanced against VLPs retaining customers unjustly. Given the limited chances of objections occurring, and there is a process in place if they do, there is no need to move away from the BSCP602 precedent.

Use of asset Meters outside of P375

Asset Metering will/may be used by:

- P376 – baselining methodology for non-Metered assets
- P379 – Secondary Suppliers will be able to allocate AMSIDs to any BM Unit
- P383 – Allows for aggregation of demand for complex storage Sites not required to pay certain charges
- CMP280/CMP281 –Complex Sites or where there is a mix of Generation and Demand
- Wider flexibility and wholesale markets – potentially use Asset Meters for trading on the wholesale market

The P375 solution will be stand-alone but will be mindful of other Modifications wherever possible

Action: How CMP280/CMP281 will use asset Meters, particularly storage sites with Generation Licences?

Appointment of Agents

The first AMSID Registrant will appoint Agents. We discussed if some technologies would be able to switch from one Agent to another. There was concern over how to deal with proprietary software and if this could be a cause for Switching objection but, BSCP601 requires that Metering Systems should be able to be switched. This is a wider issue outside of the remit of P375 and should not be considered by the P375 Workgroup.

P376 and P379 updates

P376

P376 will create a baselining methodology for Assets without a Meter. Calculations will take account of AMSIDs when determining loads. No further comments were made about P376.

P379

P379 will allow secondary Suppliers to use asset Meters. Secondary Suppliers' AMSID registration will be near identical to VLPs' AMSID registration where the asset Metter has not already been registered by a VLP. The Workgroup was keen to ensure that Secondary Suppliers can't take over the management of an Asset Meter without the VLP's agreement. There needs to be a means to identify if an AMSID is under VLP or secondary Supplier control at any given point where both register the same AMSID.

A question was raised around Physical Notifications and responsibility pre and post Gate Closure but P379 will be no different from existing provisions for Suppliers and Balancing Service Providers.

Action: P379 Workgroup is requested to consider points raised by the P375 Workgroup

SVA shared Metering

The P379 discussion led to whether we need to look at BSCP550 'Shared SVA Meter Arrangement of Half Hourly Import and Export Active Energy'. It was agreed that it is unlikely that BSCP550 needs to be amended, as an asset Meter would negate shared Metering but further feedback from Workgroup Members would be welcome if this is not the case.

Primary BM Units and P375

P375 will not allow AMSIDs to be registered 'behind' Primary BM Units. Primary BM Units can be used for P344 purposes but there is nothing to stop Suppliers registering as a VLP role and registering AMSIDs as part of a SBMU.

There may be a need to be register AMSIDs as part of a Primary BM Unit in the future but it is outside of the scope of P375 and does not address the P375 defect.

Consultation questions

The following points were agreed for inclusion with the consultation:

- Agreement with the solution
- MOA role – an open question with a request for evidence/argument against the proposed solution
- CoP 11 – affirmation of the following:
    - All relevant points have been included
    - All relevant metering standards (i.e. IEC standards) have been included
    - There is sufficient future proofing
    - relevant communication options are allowed for
    - no special measures needed for smart Meters as CoP 11 supersedes SMETS
- Customer ownership of data will follow the P344 precedent
- No need for pre-paid Meter provisions. Operating risks will be known to the VLP when registering them

ELEXON will raise awareness of the consultation and ensure key stakeholders are targeted in their communications.

Next steps

- Finalise Service Provider Impact Assessments
- Align business requirements with P379 and P376, thus aligning solutions
- Prepare consultation – prior to full consultation, share initial draft of solution section for Workgroup affirmation
- Draft legal text
- Plan for workgroup meeting in New-Year